Los Alamos National Laboratory **Environmental Restoration Program** **Standard Operating Procedure**	No: LANL-ER-SOP-01.03 Rev: 1

HANDLING, PACKAGING AND SHIPPING OF SAMPLES

	(Print Name)	(Signature)	(Date)
Prepared by	PATRICIA M. TILLERY	Patricia M Tillery	3/21/94
Quality Review by	DONNA L. WILLIAMS	Donna L Williams	3/22/94
Technical Review by	Merlin C. Wheeler	M C Wheeler	3/23/94
PM Approval	DAVID MCINROY	D M C	4/20/94
QPPL Approval	LAWRENCE A. SOUZA	L A Souza	4/19/94

Effective Date: 5/5/94

Handling, Packaging and Shipping of Samples

Table of Contents

Handling, Packaging, and Shipping of Samples

1.0 PURPOSE

This procedure describes handling, packaging, and shipping of samples collected for the Environmental Restoration (ER) Program. After preparation, the samples are transported to the radiation control (rad) van, chemical analysis (chem) van, or the Sample Coordination Facility (SCF) at TA-59 or TA-35 over public-access roads.

2.0 SCOPE

2.1 Applicability

This procedure is applicable to all ER, rad van, and chem van activities that involve the handling, packaging, or shipping of samples.

2.2 Training

Rad van and chem van personnel, the field team leader (FTL), and field team members must be familiar with the objectives of sample handling, packaging, and shipping and must document that they have read and understood this procedure as well as the other procedures in LANL-ER-SOPs, Section 1.0, General Instructions.

The packaging and transportation of Department of Transportation (DOT)-hazardous materials (including samples and supplies such as acids or gasoline) requires a field team member as well as rad van and chem van operators that are trained according to the Los Alamos National Laboratory (LANL) designation, Driver III. Contact BUS-6 for specific information on training requirements.

Packaging hazardous or radioactive samples requires more extensive training. Contact the training office of BUS-6 for further information if it is necessary.

3.0 DEFINITIONS

A. Environmental samples: Air, soil, water, or other media samples that are collected from streams, wells, and soils or other locations and are not expected to exhibit properties classified by DOT as hazardous.

B. Hazardous samples: Samples of on-site air particulates, soil, or water and materials collected at waste sites that are known or thought to meet the definition of a hazard class as defined in 49 CFR 171.8. In this SOP, "hazardous" does not refer to Resource Conservation Recovery Act (RCRA) hazardous wastes unless so stated.

C. ORM-D material: Other Regulated Material such as a consumer commodity, which although otherwise subject to the regulations of Subchapter C of 49 CFR 100, presents a limited hazard during transportation due to the form, quantity, and packaging. It must be a material for which exceptions are provided in the 49 CFR 172.101 Table.

D. Radioactive material: Any material having a specific activity greater than 2 nanocuries per gram (nCi/g), is the activity per unit mass of the material and in which the radionuclide is evenly distributed. (This is a DOT definition.)

4.0 BACKGROUND AND/OR CAUTIONS

In general, samples taken for the ER Program are expected to have low concentration of potential contaminants, although higher concentrations will be present in some cases. These low-concentration samples that do not satisfy the DOT hazard class definitions are classified as environmental samples and are thus not subject to DOT regulations. Historical data, knowledge-of-process, and field-screening results will assist the team members in making decisions as to whether a sample can be designated as "environmental" or need to be treated as a DOT hazardous material.

The samples are handled according to good field practice for environmental samples and according to regulations for hazardous samples. During shipment of samples, the sample integrity must be maintained. The health and safety of people and the environment must be protected from detrimental effects of hazardous materials if the samples are hazardous materials.

This SOP directs the preparation for shipping of environmental and sanitary waste samples. For DOT hazardous samples, including radioactive samples, this SOP guides the field team members to appropriate assistance.

All sample collection must be coordinated with the SCF coordinator for numbers and types of samples, analyses required, schedule for collection, numbers of containers required, and all other pertinent preparation information. The SCF staff schedules chemical analyses in cooperation with participating commercial and CST-9, Health and Protection Chemistry Group, analytical laboratories.

All samples collected for analysis are transported either to the rad van, chem van, or SCF for analytical services. A sample custodian will review each sample for proper sample size, container, preservative, and labels. The custodian documents any discrepancies in these areas and notifies the FTL of the possible consequences of these discrepancies and possible corrective actions. The custody of samples is then transferred to SCF.

A final data package is to be sent to the SCF staff for review by the participating laboratory. After the data have been validated, the report containing the chemical analyses will be released to the Operable Unit Project Leader (OUPL) and transferred to the ER Program's information management computer system.

5.0 EQUIPMENT

N/A

6.0 PROCEDURE

A. Classify samples collected at a site as either environmental (non-hazardous) or hazardous (including radioactive) samples according to the DOT requirements. Preliminary classification must be made in the field to ensure that the samples are transported on public-access roads safely and according to regulations. Use Sections 6.1 and 6.2 of this SOP as guides to determine characterization of sample types and applicable packaging requirements for the samples. See Attachment A for a flow chart.

B. Preserve and package samples being collected for the Laboratory's ER Program according to EPA requirements. Refer to LANL-ER-SOP-01.02, Sample Containers and Preservation for guidance.

C. Seal and label samples prior to packing the samples. Ensure that the sample containers and containers used for transport exhibit no external contamination. If necessary, decontaminate the containers according to equipment decontamination procedures.

D. Pack all samples so as to minimize the possibility of breakage during shipment. For all liquid samples, place sufficient absorbent material in the transport container to absorb all contained liquids in the event of a sample container breakage. Seal or lock the package so that any tampering can be readily detected.

E. For transport of hazardous samples or materials, prepare a Hazardous Materials Transfer Form, if applicable. Material must be packaged, marked and labeled in accordance with DOT regulations. The Hazardous Materials Transfer Form can be obtained from BUS-6 Customer Service or SCF. The Hazardous Materials Transfer Form must contain <u>two</u> 24-hour emergency telephone numbers, and a copy of the form must be sent to the Emergency Management Office.

F. After all samples are collected, packaged, and preserved, transport them to the rad van, chem van, or SCF under chain-of-custody. After the samples have been verified with the chain-of-custody documentation, a field team member relinquishes custody to rad van, chem van, or SCF personnel. Rad van or chem van personnel must maintain proper control of the samples in their custody and must reseal the packages containing samples before transporting the samples to the SCF.

G. Deliver samples to the rad van, chem van, or SCF during any legal workday between the hours of 8:00 a.m. and 12:00 p.m. and 1:00 p.m. and 5:00 p.m. Special arrangements can be made with the SCF coordinator for sample delivery during off hours.

H. All comments and any deviations from this procedure must be documented on the Daily Activity Log per SOP-01.04, Sample Control and Field Documentation.

6.1 Non-Hazardous or Environmental Samples

In general, samples that are collected in non-laboratory-use areas (for example, from wetlands, wells, and soils) are not expected to be contaminated with levels of hazardous or radioactive materials high enough to be considered hazardous by DOT. Most sampling is being performed to eliminate the question of contamination at waste management sites, and unless historical data, knowledge of process, or screening results suggest that samples are DOT-hazardous, samples will be transported as non-hazardous. Follow the instructions in Attachment B for packaging and handling environmental samples.

Samples taken from inactive sanitary waste lagoon or septic systems are exempt from all DOT and International Air Transport Authority (IATA) requirements if the sample collector can verify that the samples no longer contain infectious material. See Attachment C for instructions on handling sanitary waste.

6.2 Hazardous Samples

Although the sample media in the ER Program is expected to be soil, water, or sludge, the ER Program may have cause to sample pure product waste or highly concentrated hazardous material. If the amount of the hazardous material in the sample is small, it may be shipped under the DOT limited- or small-quantity exceptions. Small quantities of hazardous material are excepted from the DOT requirements for packaging, shipping papers, labels, and placards for that hazardous material and can be shipped as environmental samples. See exception for small quantities in 49 CFR 173.4. Hazardous materials may be transported under the limited quantity exception if that material has an excepted noted in column 8A of Table 49 CFR 172.101. Actual quantities are given in the reference indicated in Column 8A. The shipment of limited quantities must follow all requirements in the referenced section. Excepted radioactive samples must be accompanied by the specified information indicated in Section 6.2.2 of this document. For assistance, contact BUS-6 (667-4127).

6.2.1 Non-Radioactive Samples

Samples known or expected to be classified as DOT-hazardous materials must be transported according to DOT requirements. After determination of the hazardous characteristics, the selection of the appropriate hazard class and packaging exceptions, if any, can be determined from the list and text presented in 49 CFR 173.2. Attachment D provides a listing of the hazard classes and references for definitions and labeling.

Except for sanitary waste, if a known hazardous sample is to be shipped, BUS-6 must be contacted (667-4127) or SCF for assistance. In addition to the more stringent shipping requirements for hazardous samples, additional training requirements must be met to prepare these samples for transportation.

Samples taken from sanitary waste in active septic tanks or sewage lagoons can be classified as Diagnostic Specimens, which exempt them from special handling during ground transportation by 49 CFR 173.196 (h)(1). However, because these samples may be shipped by air for off-site analysis, the field team members must collect them in

the proper containers with all the appropriate packaging, per IATA. See Attachment D for collection and packaging requirements for sanitary waste samples.

CAUTION: nitric acid, which is used as a sample preservative, has restrictive DOT packaging and transportation requirements, with no exceptions allowed. All regulations in 49 CFR 172.101 and 173.158 must be followed when moving any amount of undiluted nitric acid. However, water samples preserved by nitric acid (or any other additive) are no longer forbidden because of the dilution of the nitric acid according to 49 CFR 172.101(d)(1) and can be packaged and shipped following standard practice for shipping environmental samples.

Shipment of samples preserved by DOT-regulated hazardous materials are also addressed by 40 CFR 136.3, Table II, Note 3.

6.2.2 Radioactive Samples

Most of the samples taken at ER sites will be of activity levels of 2 nCi/g or less. Since DOT only regulates radioactive material with a specific activity greater than 2 nCi/g, most samples taken at ER sites may be handled as an environmental samples unless other regulated hazards are identified or presumed to exist in the sample.

Because the DOT specifies curie amounts, which are not field readings, Attachment E, the summary table for DOT requirements for radioactive material, indicates some approximate disintegrations per minute (d/m). The health physics technician can convert d/m to counts per minute (c/m) for field readings. In this way, the health physics technician will be able to determine if a sample is above 2 nCi/g, approximately 4.4×10^3 d/m.

The LANL Radiation Protection Group (ESH-1) has established action levels of radioactivity in the ER Model Site-Specific Health and Safety Plan to alert the health physics technician of increased requirements for workers protection. Action Levels I and II, noted in Attachment E, are below the DOT-regulated radioactivity. Even though the LANL action levels of radioactivity are not regulated by DOT, special safety precautions must be taken if the activity at a sample location indicates one of the action levels. Be sure to follow all requirements in the Site-Specific Health and Safety Plan.

For materials exceeding the minimum 2 nCi/g activity, the following information applies. Contact BUS-6 for assistance if the health physics technician indicates readings in the following ranges:

A. For materials with activities of greater than 2 nCi/g but less than Type A quantities, DOT identifies a limited-quantity category and specifications for excepted packaging. Radioactive materials in the limited-quantity category may

be transported with minimum restrictions. See Attachment E for a summary sheet of DOT categories and levels of radioactivity in this category. Limited-quantity shipments must have the following label:

> **This package conforms to the conditions and limitations specified in 49 CFR 173.421 for radioactive material, excepted package-limited quantity of material, UN2910.**

B. Type A and B quantity samples are not expected in the ER Program. However, the summary sheet indicates the continuum of shipping requirements for all radioactive material. The summary sheet also indicates d/m for some isotopes that would cause those isotopes to be shipped as Type A material.

Also, be sure to keep the SCF coordinator informed if levels of radioactivity are in the action level or limited-quantity ranges. Refer to Attachment E for activities for these ranges. The SCF coordinator will need to make special arrangements for handling the samples to keep SCF personnel from unknowingly receiving doses of radiation and to keep SCF equipment from contamination.

If 2 nCi/g activity is exceeded, and a package for transportation must be shipped limited quantity, follow the packaging requirements listed in the summary sheet. Contact BUS-6 or SCF for assistance.

7.0 REFERENCES

The following are directly related to this procedure and should be reviewed before field operations:

LANL-ER-SOPs in Section 1.0, General Instructions.

LANL Environmental Safety and Health Administrative Requirements, AR 10-3, Hazardous and Mixed Waste.

40 CFR, 1993. Code of Federal Regulations, Title 49, U.S. Environmental Protection Agency, Parts 100 -149. July 1, 1993, U.S. Government Printing Office, Washington, D.C.

49 CFR. 1994. Code of Federal Regulations, Title 49, U.S. Department of Transportation, Parts 100-199. October 1, 1992. U.S. Government Printing Office, Washington, D.C.

Charlton, Thomas J., P.E., Chief, Standards Division, Office of Hazardous Materials Regulation, Materials Transportation Bureau, DOT, Letter to Myron D. Lair, P.E., Chief, Hazardous Waste Section, ESB, ESD, Region IV, EPA, March 22, 1985.

Dangerous Goods Regulations, International Air Transport Authority. 35th Edition, Effective January 1, 1994.

EPA Region IV, 1991. Standard Operating Procedures and Quality Assurance Manual. Environmental Services Division, Athens, GA.

Los Alamos National Laboratory, 1993. Installation Work Plan for Environmental Restoration. LA-UR-93-3987.

Weitzman, David, "Final Regulation Package for Compliance with DOT Regulations in the Shipment of Environmental Laboratory Samples," Memo from Work Group Chairman, Office of Occupational Health and Safety (PM-273), EPA, April 13, 1981.

8.0 RECORDS

A. Completed Chain-of-Custody/Request for Analysis Form

B. Completed Daily Activity Log

C. Copy of the Hazardous Material Transportation Form, if applicable

It is the responsibility of the OUPL to ensure that records are transmitted to the Records Processing Facility, MS M707.

9.0 ATTACHMENTS

A. Flow Chart for Sample Classification for Shipping

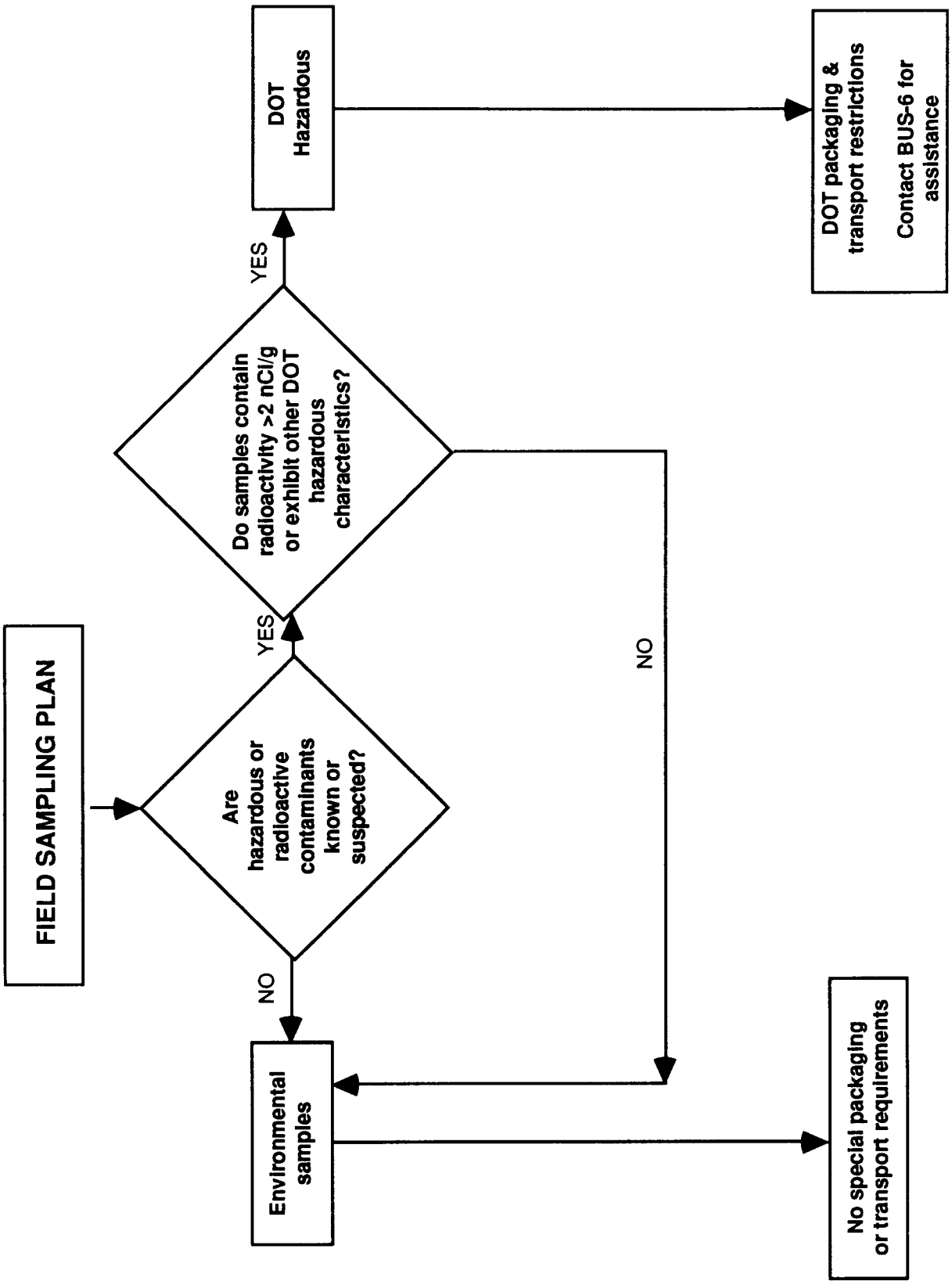
B. Preparation of Environmental Samples for shipment

C. DOT Hazardous Material Classification

D. Preparation of Sanitary Waste Samples for Shipment

E. Range of Material Radioactivities and Corresponding Transportation Requirements

FLOW CHART FOR SAMPLE CLASSIFICATION FOR SHIPPING



PREPARATION OF ENVIRONMENTAL SAMPLES FOR SHIPMENT

Environmental samples must be prepared for delivery in the following manner:

A. Packaging

1. Before any samples are placed in their delivery containers, the exterior of the sample containers should be decontaminated, if appropriate, and wiped dry.

2. For purposes of controlling leakage, sample containers should be placed, properly labeled and securely sealed, into a polyethylene sealable (e.g., Ziplock®) bag and the bag sealed.

3. If there are multiple sample containers, care should be taken to prevent breakage. Styrofoam "peanuts" or other cushioning material should be used as appropriate to prevent multiple samples from being broken during movement.

4. If the FTL deems it necessary for liquid samples, sufficient absorbent material should be placed in the cooler (or other transport container) to absorb all liquid in the event of a sample container breakage.

5. For samples requiring preservation at 4°C ± 2°C, the samples with ice or Blue Ice™ should be placed in a sturdy ice chest. The presence of ice or frozen Blue Ice™ in an amount approximately equal to the volume of samples is sufficient indication that the samples are adequately cooled.

6. When wet ice is used, it must be placed in sealed containers, such as doubled Ziplock® bags, so water does not fill the cooler as the ice melts.

HINT: If wet ice is to be used, try to purchase and use the "old" ice (bags at the bottom of the store's freezer) because newly delivered ice is not as efficient as ice that has been in the store's freezer for several days.

7. If samples are to be immediately chilled to below 4°C before delivery, they must be totally immersed in a separate cooler containing an ice slush solution that is below 4°C. To ensure this tempature before placing samples in the delivery container, a sample container of the same size filled with distilled water can be checked with a thermometer to determine when the samples have reached the desired temperature. The temperature check must be recorded.

8. Water samples must not be frozen or shipped with dry ice.

9. When using Blue Ice™, samples for volatile organic analysis (VOA) must be wrapped with bubble pads because direct contact between the samples and Blue Ice™ can freeze and burst the 40-ml VOA vial.

10. Completed original Chain-of-Custody/Request for Analysis forms (LANL-ER-SOP-01.04) must be placed in watertight containers and placed inside the shipping container lid.

11. The cooler or other transport container must be completely closed and secured with tape.

B. Marking/Labeling

DOT placards, marking, or labeling are not required for non-DOT regulated environmental samples that are taken to the rad van, chem van, or SCF*. However, per 40 CFR 261.4 (d), all samples must be accompanied by

- The sample collector's name, mailing address, telephone number
- The laboratory's name, mailing address, telephone number
- The quantity of the sample
- The date of shipment
- Description of the sample

Some of the required information is contained on the chain-of-custody form. The first two bulleted items are not on the chain-of-custody form, so a piece of paper containing that information might be preprinted to attach to the chain-of-custody form or otherwise placed with the cooler.

Transport containers (ice chests) will be marked Environmental Samples.

* For samples from septic tanks and lagoons that contain sanitary waste, see Attachment D for packaging and shipping requirements.

PREPARATION OF SANITARY WASTE SAMPLES FOR SHIPPING

These instructions are for the handling and shipping of samples from septic tanks and lagoons that contain sanitary waste.

A. Samples from Inactive Septic Systems and Lagoons

A number of septic systems at the Laboratory have been inactive and have not received sanitary waste in a number of years. If the ER Program is taking samples from these septic systems, the field team manager and the OUPL can conclude that the sample media is not infectious using the following prudent and resource-conservative philosophy:

- The types of human pathogens found in sanitary waste cannot maintain a viable state because conditions of pH, temperature, oxygen and other gases, etc., are not favorable.

- Without the addition of new waste and new pathogens, the samples are not infectious.

If the OUPL and the field team manager decide that samples from inactive sanitary waste systems are not infectious, the decision, with the supporting reasons, should be documented in the Daily Activity Log. These samples can be collected and prepared for transport as soil or water samples and designated as environmental samples.

B. Samples from Active Septic Systems and Lagoons

Samples that come from active sanitary systems and are expected to contain human wastes can be designated as diagnostic samples and are excluded from the specific packaging and shipping requirements per 49 CFR 173.196 (h)(1). However, because some ER Program samples must be shipped by air to meet EPA holding-time requirements, collection and preparation of these samples must satisfy IATA requirements.

According to IATA provisions, these shipments can be identified as Diagnostic Specimens "that have a low probability of containing infectious substances." The field team manager or OUPL may determine the following prudent and resource-conservative philosophy:

- Even though there may be infectious substances in the sample, the count would be low, and the probability of sudden illness or death occurring from contact with the infectious substance is low.

- If this determination is made, the responsible party may designate the diagnostic specimen as having a low probability of containing infectious substances.

- This designation reduces the testing requirements for the containers and increases the allowed amounts in a shipping package.

If the OUPL and the field team manager decide that samples from active sanitary waste systems are diagnostic specimens with low probability for causing illness or death, the decision with the supporting reasons should be documented in the Daily Activity Log.

For ground transportation of these samples, these samples can be packaged and transported as though they were environmental samples. The SCF will be responsible for packaging and shipping the samples, whether by ground or air, to an off-site laboratory. However, if these samples will be shipped by air, certain restrictions will apply.

1. Containers

   For material designated as diagnostic specimens, the total volume per shipping container cannot exceed 500 ml, and the maximum volume per inner container must not exceed 100 ml. Therefore, when SCF indicates that the samples will be shipped by air, they must be collected in containers that are typically smaller than those used for analyses. The sampling team must coordinate with the SCF to address this issue before taking samples because SCF is responsible for packaging the shipment per IATA 650. The SCF will provide sample containers that meet IATA 650.

2. Warning Labels

   Although DOT does not require placarding or labeling, safety of laboratory personnel requires that the samples should be identified as sanitary waste. A label will alert all personnel handling the samples as to the sample's potential hazard. A typical warning label attached to the outside of the transport container might read

   This package contains samples of sanitary waste. If leakage is noted, take all prudent precautions and notify the sampling team that collected the samples.

DOT HAZARDOUS MATERIAL CLASSIFICATION (49 CFR 173.2)

Class No.	Name of Class or Division	49 CFR Definition Reference	49 CFR Label Reference
1	Explosives	173.50	172.411
2	Gases	173.115	172.415, 416 and 417
3	Flammable and combustible liquid	173.120	172.419
4.1	Flammable solid	173.124	172.420
4.2	Spontaneously conbustible material	173.124	172.422
4.3	Dangerous when wet material	173.124	172.423
5.1	Oxidizer	173.127	172.426
5.2	Organic peroxide	173.128	172.427
6	Poisonous and infectious materials	173.132 and 134	172.430, 431 and 432
7	Radioactive Material	173.403	172.436, 438 and 440
8	Corrosives	173.136	172.442
9	Other Regulated Material	173.140	172.446

RANGE OF MATERIAL RADIOACTIVITIES AND CORRESPONDING TRANSPORTATION REQUIREMENTS

DOT Definition "Radioactive Material"

Not Regulated in Transport	Limited Quantities	Type A Quantity*	Type B Quantity*
<u>LANL ESH-1 Action Level I**</u> Above background but, < 500 cpm/probe α < 5000 cpm/probe β/γ	See 49 CFR 173.421 Contact BUS-6		
	Packaging: Strong, tight, leakproof External rad ≤ 0.5 mrem Outside package marked "Radioactive" If no inner packaging, otherwise inner packaging "Marked"		See 49 CFR 173.431
<u>LANL ESH-1 Action Level II**</u> ≥ 500 cpm/probe α ≥ 5000 cpm/probe β/γ ≥ 5 mR/hr	Excepted from: Shipping papers & Certification Specification packaging Labeling Marking		
	2 nCi/g (0.002 μCi/g) 4.4×10^3 d/m	^{60}Co, 1×10^{10} d/m ^{226}Ra, 1×10^8 d/m ^{227}Ra, 6×10^6 d/m ^{230}Th, 4×10^8 d/m ^{235}U, 4×10^8 d/m ^{238}Pu, 6×10^6 d/m ^{239}Pu, 4×10^6 d/m ^{241}Am, 1×10^7 d/m For others, see 49 CFR 173 Subpart I	

*Not expected in the ER program

**Follow requirements cited in the Site-Specific H&S